EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

ESTATE OF GEORGE BERNARD WORRELL, JR.,	Case No. 4:22-cv-11009
Plaintiff,	District Judge F. Kay Behm
v.	Magistrate Judge David R. Grand
THANG, INC., and GEORGE CLINTON.	
Defendants.	

_____/

DEFENDANTS' EXPERT WITNESS LIST

Defendants Thang, Inc. and George Clinton ("Defendants") submit the

following expert witness list pursuant to the Court's Case Management Order,

dated June 20, 2024.

Defendants do not intend to call independent expert witnesses. Defendants

identify following individuals as rebuttal expert witnesses:

1. Evan Loker
   CONSOR IP Experts
   Rebuttal expert on damages

   c/o Schenk & Bruetsch
   211 W. Fort Street, Ste. 1410
   Detroit, MI 48226
   (313) 774-1000

2. Alan Elliott
   Rebuttal expert on musicology

   c/o Schenk & Bruetsch
   211 W. Fort Street, Ste. 1410

Detroit, MI 48226
(313) 774-1000

Defendants reserve the right to amend this expert witness list based on any subsequently disclosed information in this matter. Further, the parties' rebuttal reports are due January 6, 2025; however, Defendants still have not received Plaintiff's affirmative expert report on damages. Given the impending deadline and the limited availability of witnesses around the holidays, Defendants will be filing a motion to amend the Case Management Order regarding expert discovery, unless the parties can reach an agreement on scheduling. Defendants reserve all rights and objections with respect to Plaintiff's expert disclosures.

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Respectfully submitted:
SCHENK & BRUETSCH PLC

By: /s/ Peter E. Doyle
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Attorneys for Defendants

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December 13, 2024

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the attorneys of record.

/s/ Peter E. Doyle